

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
- v. -	:	
	:	
ROSS WILLIAM ULBRICHT,	:	13 Civ. 6919 (KBF)
a/k/a "Dread Pirate Roberts,"	:	
a/k/a "DPR,"	:	<b>STIPULATION &amp; ORDER</b>
a/k/a "Silk Road,"	:	
	:	
Defendant,	:	
	:	
ANY AND ALL ASSETS OF SILK ROAD;	:	
	:	
And All Property Traceable Thereto, Including But	:	
Not Limited to the BITCOINS LOCATED ON	:	
ULBRICHT'S COMPUTER HARDWARE,	:	
	:	
Defendants <i>in rem</i> .	:	
-----X	:	

WHEREAS, on September 30, 2013, the United States commenced this action (the "Action"), upon the filing of a verified complaint (the "Complaint") seeking the forfeiture of the above-captioned Defendants *in rem*, pursuant to Title 18, United States Code, Section 981(a)(1)(A), as property involved in money laundering transactions, in violation of Title 18, United States Code, Section 1956, and civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against Ross William Ulbricht ("Ulbricht");

WHEREAS, on or about October 24, 2013, upon the application of the United States, the Court entered a protective order which, among other things, authorized the United States to seize any and all Bitcoins contained in wallet files residing on certain computer

hardware belonging to Ulbricht, by transferring the full account balance in each wallet to a Bitcoin address controlled by the United States (the “defendant *in rem* Bitcoins”);

WHEREAS, on or about December 12, 2013, Ulbricht filed a Verified Claim to the defendant *in rem* Bitcoins; and

WHEREAS, other than Ulbricht, no other individual or entity filed a verified claim for the defendant *in rem* Bitcoins before the deadline to do so on January 6, 2014;

WHEREAS, on or about January 27, 2014, upon the joint application of the parties, this Court entered an Order for the Interlocutory Sale of the defendant *in rem* Bitcoins;

WHEREAS, the sale of the defendant *in rem* Bitcoins resulted in cumulative net proceeds of \$48,238,116.04, which are the substitute *res* for the defendant *in rem* Bitcoins (the “Defendant Funds”);

WHEREAS, on June 3, 2015, a Preliminary Order of Forfeiture / Money Judgment was entered against Ulbricht in *United States v. Ulbricht*, S1 14 Cr. 68 (KBF) (the “Money Judgment”); and

WHEREAS, the parties have agreed to resolve their respective claims on the terms set forth below;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, through its attorney, Joon H. Kim, United States Attorney for the Southern District of New York, Christine I. Magdo, Assistant United States Attorney, of counsel, and Ross William Ulbricht (“Ulbricht”), by and through his counsel, Paul Grant, Esq., that:

1. Ulbricht hereby withdraws his Verified Claim to the defendant *in rem* Bitcoins filed on December 12, 2013, and the Verified Claim is hereby dismissed with prejudice.

2. All right, title and interest in the Defendant Funds are hereby forfeited to the United States, and shall be disposed of according to law.

3. The sum of \$48,238,116.04 shall be credited in partial satisfaction of the Money Judgment.

4. The forfeiture of the Defendant Funds shall constitute full and complete satisfaction of the United States' claims in this Action against Ulbricht, and for any and all other civil claims that could have been brought against Ulbricht in relation to the facts alleged in the Complaint.

5. Ulbricht is hereby barred from asserting any civil claim against the United States or any of its agents and employees (including, without limitation, the Federal Bureau of Investigation, the Drug Enforcement Administration, the Internal Revenue Service, and the United States Attorney's Office for the Southern District of New York) concerning, arising out of, or resulting from the filing of this Action, including without limitation that Ulbricht is a prevailing party or that Ulbricht is entitled to attorney fees.

6. Ulbricht and the United States hereby waive all rights to appeal or to otherwise challenge or contest the validity of this Stipulation and Order.


7. Each party shall bear its own costs and attorney fees.

8. The signature pages of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will

AGREED AND CONSENTED TO:

JOON H. KIM

Acting United States Attorney for the  
Southern District of New York

By: 

Christine I. Magdo  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2297

9/29/17

Date

ROSS WILLIAM ULBRICHT

By: 

Ross William Ulbricht

9/27/17

Date


By: 

Paul Grant  
Law Office of Paul Grant  
P.O. Box 2720  
Parker, Colorado 80134  
(303) 909-6133

9-28-17

Date

SO ORDERED:

  
THE HONORABLE KATHERINE B. FORREST  
UNITED STATES DISTRICT JUDGE

9/29/17

Date